# EXHIBIT D

## **Suzanne Lane**

**From:** mkrashin@bannerwitcoff.com

Sent: Sunday, December 04, 2016 8:45 PM

To: Sara Fish

Cc: Wes Musselman; Bailey Harris; Jackob Ben-Ezra; Natalie Arbaugh; Victoria Webb;

jberghammer@bannerwitcoff.com

**Subject:** RE: RTIC/YETI - Coolers for Crawford Deposition

Sara, we agree to have the cross-sectioned YETI and RTIC coolers identified in Dr. Crawford's opening report on the asserted patents available at his deposition on Tuesday, December 6.

We do not agree to bring additional materials based on your email below.

### Michael

Michael L. Krashin | Attorney

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**From:** Sara Fish [mailto:sfish@fr.com] **Sent:** Friday, December 02, 2016 10:44 AM

To: Victoria Webb; Michael Krashin; Joseph Berghammer

Cc: Wes Musselman; Bailey Harris; Jackob Ben-Ezra; Natalie Arbaugh

Subject: RTIC/YETI - Coolers for Crawford Deposition

### Hi Vicki and Michael,

Can you please bring or have Dr. Crawford bring with him to the deposition on Tuesday December 6<sup>th</sup> the RTIC coolers and YETI coolers that Dr. Crawford references in his three expert reports? Specifically, Dr. Crawford's report relating to patent infringement indicates he relied on "RTIC's current coolers" and "YETI's coolers" (Report at 6), and his report relating to cooler performance indicates he relied on "physical samples and images of YETI's" coolers (Report at 7).

We also request that Dr. Crawford bring with him any additional documents or materials relating to the CAD/Solidworks modeling and testing Dr. Crawford conducted to support his cooler performance report that have not already been produced.

Thank you,

### Sara Fish

Associate :: Fish & Richardson P.C.

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